

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MARK E. DOTTORE, RECEIVER)	CASE NO. 1:19-cv-380
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
v.)	MAGISTRATE JUDGE
)	THOMAS M. PARKER
STUDIO ENTERPRISE MANAGER, LLC)	
<i>et al.</i> ,)	
)	
Defendants.)	

DECLARATION OF DEBBI LANNON-SMITH

Debbi Lannon-Smith hereby declares under penalty of perjury that the following is true and correct:

1. I am a resident of the State of Arizona.
2. I make the within declaration from my own personal knowledge, and I am competent to so testify.
3. I am the Chief Human Resources Officer at Dream Center Education Holdings, LLC (“DCEH”).
4. I am aware that in early January 2019 the Argosy University System, the Arts Institute University System, and the South University System and Studio Enterprise Manager, LLC (“Studio”), among others, entered into a series of Master Services Agreements (“MSAs”) with one another.

5. Under the MSAs, Studio agreed to perform certain services for the Argosy University System, the Art Institute University System, and the South University System.
6. Studio has not provided these services for the Argosy University System or the South University System.
7. In addition, I have reviewed Studio's Memorandum in Opposition to Receiver's Motion for a Temporary Restraining Order and Preliminary Injunction. In particular, I reviewed page 10, footnote 9 of Studio's Memorandum in which Studio lists a number of services that it purportedly has provided.
8. Studio has not performed any of these services for the Argosy University System or the South University System.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief. Executed the 26th day of February, 2019 in Phoenix, Arizona.


Debbi Lannon-Smith